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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE BOARD OF TRUSTEES OF THE
CONSTRUCTION INDUSTRY AND
LABORERS JOINT PENSION TRUST,
CONSTRUCTION INDUSTRY AND
LABORERS JOINT PENSION TRUST,

Plaintiffs,

vs.

SENTINEL MAINTENANCE OF LAS VEGAS,
LLC, a Nevada limited liability company, SMI,
LLC, a Nevada limited liability company,
Sentinel 2, LLC f/k/a SMI, LLC, a Nevada
limited liability company, SENTINEL 1, LLC
f/k/a Sentinel Maintenance of Las Vegas, LLC, a
Nevada limited liability company

Defendants.

Case No. 2:23-cv-01633-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT [ECF No. 42]**

[FIRST REQUEST]

Re: stipulation at ECF No. 60

Plaintiffs, the Board of Trustees of the Construction Industry and Laborers Joint Pension Trust and Construction Industry and Laborers Joint Pension Trust (“Pension Trust”), and Defendants Sentinel Maintenance of Las Vegas and SMI, LLC (“New Sentinel Entities”) (collectively, the “Parties”) by and through their respective counsels of record, hereby stipulate and agree to allow the Reply in Support of the Motion for Summary Judgment to be filed on February 4, 2025.

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1 1. On October 31, 2024, the Pension Trust filed its Motion for Summary Judgment.
2 *See* ECF No. 43.

3 2. On November 20, 2024, the Parties stipulated to extend the New Sentinel Entities
4 time to respond by two weeks. *See* ECF No. 46.

5 3. Thereafter, the New Sentinel Entities moved to extend the deadline to respond four
6 times. *See* ECF Nos. 49, 50, 52, and 55.

7 4. After the Fourth Motion to Extend, the Pension Trust filed a Notice of Intent to
8 Oppose, given the amount of extensions that had been requested. *See* ECF No. 56.

9 5. The New Sentinel Entities filed their response on January 7, 2025. *See* ECF No.
10 58.

11 6. Thereafter, the Pension Trust withdrew its intent to oppose the Fourth Motion to
12 Extend. *See* ECF No. 59.

13 7. Counsel for the Pension Trust has had briefing due in multiple cases during the 14-
14 day period to file the Reply in Support of the Motion for Summary Judgment. Given this
15 workload, counsel for the Pension Trust have requested, and counsel for the New Sentinel Entities
16 have agreed, to extend the deadline to file a Reply by an additional 14 days.

17 8. The parties agree that the Pension Trust will have up to and including February 4,
18 2025, to file its Reply.

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9. This request is made in good-faith and not for the purpose of delay.

Dated: January 15, 2025.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

JACKSON LEWIS P.C.

/s/ Christopher M. Humes

/s/ Paul Trimmer

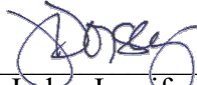
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ORDER

IT IS HEREBY ORDERED that the deadline for the Pension Trust to file its Reply in Support of the Motion for Summary Judgment is extended to and including February 4, 2025.



U.S. District Judge Jennifer A. Dorsey
Dated: January 22, 2025